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**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

JOHN SABATINI, an individual,

Plaintiff,

vs.

LAS VEGAS METROPOLITAN POLICE
 DEPARTMENT,

Defendant.

Case No. 2:17-cv-01012-JAD-NJK

**STIPULATION TO EXTEND DEADLINE
 TO FILE DISPOSITIVE MOTIONS**

(First Request)

CHARLES MOSER,

Plaintiff,

vs.

DEVIN BALLARD, an individual, *et al.*,

Defendants.

Case No. 2:17-cv-01704-JAD-NJK

Pursuant to LR 6-1 and LR 26-4, the parties, by and through their respective counsel of record, hereby stipulate and request that this Court extend the deadline for all parties to file dispositive motions in the above-captioned Consolidated case for a period of 30 days, up to and including Thursday, June 14, 2018.

1 In support of this Stipulation and Request, the parties state as follows:

2 All discovery in this matter is complete. However, due to scheduling issues
3 in arranging for the depositions of multiple witnesses, depositions were not
4 completed until recently. The current deadline to file dispositive motions is May
5 15, 2018. The parties plan to file one or more motions for summary judgment and,
6 given the complexity of issues involved in such motions, require additional time
7 to prepare them. The parties expect that a 30-day extension until June 14, 2018
8 will provide sufficient time.

9 Applications to extend any date set by the discovery plan, scheduling
10 order, or other order must, in addition to satisfying the requirements of LR 6-1, be
11 supported by a showing of good cause for the extension. In accordance with
12 LR 26-4, all motions or stipulations to extend a deadline set forth in a discovery
13 plan shall be received by the Court no later than twenty-one (21) days before
14 the expiration of the subject deadline. A request made after the expiration of
15 the subject deadline shall not be granted unless the movant demonstrates that
16 the failure to act was the result of excusable neglect. Any motion or stipulation
17 to extend a deadline or to reopen discovery shall include:

- 18 (a) A statement specifying the discovery completed;
- 19 (b) A specific description of the discovery that remains to be completed;
- 20 (c) The reasons why the deadline was not satisfied or the remaining
21 discovery was not completed within the time limits set by the discovery
22 plan; and
- 23 (d) A proposed schedule for completing all remaining discovery.

24 It is not good cause for a late request to extend discovery that the parties
25 informally postponed discovery. No stipulations are effective until approved by
26 the Court, and "[a]ny stipulation that would interfere with any time set for
27

completion of discovery, for hearing of a motion, or for trial, may be made only with approval of the Court." See LR 7-1(b).

IT IS SO STIPULATED.

Dated this 23rd day of April 2018.

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/s/ Alex J. Shepard

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IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: April 24, 2018